

**IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT  
OF TENNESSEE AT CHATTANOOGA**

**JASON AARON McCOLLUM,** \*  
Plaintiff, \* **No. 1:04-cv-336**  
\*  
**versus** \* **JURY DEMAND**  
\*  
**CITY OF CHATTANOOGA, et al.** \* **COLLIER / LEE**  
Defendants. \*  
\*  
\* **MOTION FOR CONSOLIDATION**

THE PLAINTIFF, through counsel, and pursuant to FED. R. CIV. P., Rule 42 and submits this Motion for Consolidation with the claim of Plaintiff Matthew Trent Jones (“Jones”) in his separate case number 1:05-cv-245. In support of this Motion Plaintiff relies on his Memorandum of Law.

Respectfully submitted,

BY: s/ Robin Ruben Flores  
**ROBIN RUBEN FLORES, TENN. BPR #20751**  
**A. PHILLIP LOMONACO, TENN. BPR #11579**  
Attorneys for Plaintiff  
615 Walnut Street, Suite 208  
Chattanooga, TN 37402 423 / 2671575  
Email: [robinflores@comcast.net](mailto:robinflores@comcast.net)

*Certificate of service on next page.*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 21<sup>st</sup> day November, I served 2005 a true and accurate copy of the foregoing document on the following counsel, by placing same by the Electronic Filing System\* to,

Phillip Noblett, Esq. \*  
City Attorney's Office  
801 Broad Street, Suite 400  
Chattanooga, TN 37403  
Special Counsel for City of Chattanooga, and Chattanooga Police Department

John Cavett, Esq.\*  
801 Broad Street  
Chattanooga, TN 37402

Aaron Mason, Esq.\*  
40 Capitol Square, S.W. Atlanta, GA 303341300  
Attorney for Ernest Bonaparte

John Houston, Esq.\*  
707 Georgia Avenue, Suite 402  
Chattanooga, TN 37402

Gerald Tidwell, Esq.\*  
736 Georgia Ave, Ste 600  
Chattanooga, TN 37402

Other delivery shall be made by U.S. Mail, postage pre-paid to:

Mike Raulston, Esq.  
511 Georgia Avnue, 2<sup>nd</sup> Fl.  
Chattanooga, Tn 37403

s/ Robin Ruben Flores